

In re:
Angelina Geiger
Debtor

Case No. 20-13311-mdc
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-2
Date Rcvd: Mar 11, 2022

User: admin
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

| Symbol | Definition |
|--------|--|
| + | Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP. |

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 13, 2022:

| Recip ID | Recipient Name and Address |
|----------|--|
| db | + Angelina Geiger, 1119 North 63rd Street, Philadelphia, PA 19151-3209 |

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 13, 2022

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 11, 2022 at the address(es) listed below:

| Name | Email Address |
|----------------------|--|
| ANNE M. AARONSON | on behalf of Creditor POLICE AND FIRE FEDERAL CREDIT UNION aaaronson@dilworthlaw.com mdolan@dilworthlaw.com;cchapman-tomlin@dilworthlaw.com;mferrier@dilworthlaw.com |
| GEORGETTE MILLER | on behalf of Debtor Angelina Geiger Miller.GeorgetteR50524@notify.bestcase.com;mlee@margolisedelstein.com |
| KENNETH E. WEST | ecfemails@ph13trustee.com philaeef@gmail.com |
| REBECCA ANN SOLARZ | on behalf of Creditor U.S. Bank NA successor trustee to Bank of America, NA, successor in interest to LaSalle Bank National Association, on behalf of the registered holders of Bear Stearns Asset Backed Securities I Trust bkgroup@kmlawgroup.com, rsolarz@kmlawgroup.com |
| ROBERT PATRICK WENDT | on behalf of Creditor TOYOTA MOTOR CREDIT CORPORATION paeb@fedphe.com |

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LeopoldAssociatesPAX6428@projects.filevine.com

United States Trustee

USTPRegion03.PH.ECF@usdoj.gov

YONIT A. CAPLOW

on behalf of Creditor POLICE AND FIRE FEDERAL CREDIT UNION ycaplow@dilworthlaw.com
cchapman-tomlin@dilworthlaw.com,cct@dilworthlaw.com;mdolan@dilworthlaw.com

TOTAL: 7

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---------------------------------|---|
| IN RE: ANGELINA GEIGER, <div style="text-align: right; padding-right: 20px;">Debtor.</div> | : : : : : : : | Chapter 13 Case No. 20-13311 (MDC) |
|--|---------------------------------|---|

**AMENDED STIPULATION RESOLVING MOTION OF POLICE AND FIRE FEDERAL
CREDIT UNION FOR RELIEF FROM THE AUTOMATIC STAY AND RESOLVING
OBJECTION OF POLICE AND FIRE FEDERAL CREDIT UNION TO
CONFIRMATION**

The parties filed a Stipulation resolving a Motion for Relief for Automatic Stay and Objection to Confirmation on February 18, 2022, docket #84. This Court approved the Stipulation on February 22, 2022, docket #87. The parties seek to Amend the Stipulation to state the following:

WHEREAS, on August 11, 2020 (the “Petition Date”), the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”);

WHEREAS, prior to the Petition Date, Debtor was indebted to PFFCU pursuant to a Home Equity Loan. This financing is secured by real property located at 1119 N. 63rd Street, Philadelphia, PA 19151 (the “Real Property”);

WHEREAS, the Debtor’s obligation to PFFCU for the Real Property is reflected in the Debtor’s schedules;

WHEREAS, the Debtor has not made payments to PFFCU since the Petition Date, and is 16 months in arrears on her payments on the Home Equity Loan as of the date of this Stipulation;

WHEREAS, the balance owed to PFFCU to satisfy the Home Equity Loan as of the date of this Stipulation is \$25,112.20 (the “Claim”);

WHEREAS, on September 3, 2021, PFFCU filed a motion for relief from the automatic stay to exercise its rights with respect to the Real Property due to the lack of adequate protection (the “Motion”);

WHEREAS, the hearing on the Motion was continued numerous times;

WHEREAS, on October 13, 2021, the Debtor filed her Second Amended Plan (the “Plan”) proposing to wrap the Debtor’s post-petition arrears into the Plan and pay the Home Equity Loan in full through the Plan;

WHEREAS, on January 5, 2022, PFFCU filed an Objection to the Plan on the basis that, *inter alia*, the Plan was speculative and not feasible, the Plan was a step up plan with no realistic means of paying the increased payments, and the Debtor is significantly in post-petition arrears to PFFCU (the “Objection”);

WHEREAS, an evidentiary trial on the Motion and on Confirmation is scheduled for February 22, 2022 at 1 P.M. (the “Trial”);

WHEREAS, to avoid the costs of litigation and Trial, the Parties have agreed to amicably resolve the Motion and the Objection on the terms set forth herein;

NOW THEREFORE, each in consideration of the promises of the other and intending to be legally bound, subject to the approval of the Bankruptcy Court, it is hereby agreed as follows:

1. Upon entry of this Stipulation by the Court, the Objection and the Motion will be withdrawn.

2. The Debtor agrees to allow the Chapter 13 Trustee to make adequate protection payments in the amount of \$462.92 commencing April 2022 until normal distributions begin to be paid to PFFCU. The Debtor shall receive a credit for all adequate protection payments made against the allowed secured claim to be received by PFFCU (\$25,112.20) plus interest as being paid through the plan.

3. Upon the earlier of the Debtor's failure to timely make two consecutive payments to the Chapter 13 Trustee or the Chapter 13 Trustee filing a motion to dismiss, PFFCU can serve a notice of default on the Debtor, through counsel, and the Debtor will have 10 days to cure such default, absent which PFFCU can file a Certification of Default with the Court. Upon the filing of the Certification of Default, the Court shall enter an order granting PFFCU relief from the automatic stay, in rem, as to the Real Property.

4. Each of the signatories to this Stipulation acknowledges and represents that their respective clients have reviewed this Stipulation and have authorized the execution of same by their undersigned counsel.

5. If the instant bankruptcy case is terminated by either dismissal or discharge other than pursuant to 11 U.S.C. § 1328(a), this Stipulation shall be null and void and not binding upon the Parties.

6. This Stipulation may be executed by facsimile and/or e-mail and such facsimile and/or e-mail signatures shall be deemed originals.

7. The signature pages of this Stipulation may be executed in counterparts, and such signature pages, when attached, shall constitute the entire document.

CONSENTED TO BY:

DILWORTH PAXSON LLP

DATED: March 9, 2022

/s/ Yonit A. Caplow

Yonit A. Caplow, Esquire
Attorney for PFFCU

CONSENTED TO BY:

Michelle Lee

DATED: March 9, 2022

/s/ Michelle Lee

Michelle Lee, Esquire
Attorney for Debtor

CONSENTED TO BY:

LEEANE HUGGINS,
CHAPTER 13 TRUSTEE

DATED: March 9, 2022

/s/ LeeAne Huggins

LeeAne Huggins
Chapter 13 Trustee

SO ORDERED:

ENTERED ON: March 10, 2022



Magdeline D. Coleman
Chief U.S. Bankruptcy Judge